



Whirlwind Helicopters Inc.

P.O. Box 4, Clovis, California, USA 93613
Phone (559)-292-5248 Fax (559)-292-5240

TO: Deepak Joshi, Lead Aerospace Engineer (Structures)
FAX NO: (202) 314-6349
COMPANY: National Transportation Safety Board, Room 5235
490 L'Enfant Plaza, SW
Washington, D.C.
DATE: March 11, 2005
FROM: Wanda L. Rogers
SUBJECT: NTSB Notice of Proposed Rulemaking (NPRM 427)
NUMBER OF PAGES: 2 including this page.



Whirlwind, Inc.

P.O. Box 4, Clovis, California, USA 93613
Phone (559)-299-4903 Fax (559)-292-5240

March 10, 2005

Deepak Joshi
Lead Aerospace Engineer (Structures)
National Transportation Safety Board, Room 5235
490 L'Enfant Plaza, SW
Washington, D.C.

The following is regarding NTSB Notice of Proposal Rulemaking (NPRM 427) posted in the Federal Register pages 77150 to 77152 on December 27, 2004 that proposes to eliminate ground rotor blade strike exemption from the "Substantial Damage" definition of 47 CFR 830.2.

Whirlwind, Inc (dba TGR Helicopters) strongly opposes the elimination of this exemption. This proposed change will cause a serious financial burden to Whirlwind, Inc. due to the increased downtime of our helicopters resulting from the required reporting procedures of a "Substantial Damage". Whirlwind, Inc. is heavily utilized in service to utility companies.

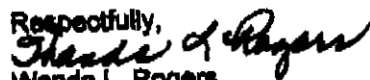
In our 43 years of operation it is our experience that most "ground blade strikes" are usually minor incidents and do not cause substantial damage to any rotating parts or the airframe itself. The manufacturer's maintenance manuals explicitly cover the required inspections after a "ground blade strike". If any damage is found, it is usually limited to the blade tip cap. When proper guidelines are followed, and the helicopter has been found to have no further damage it can quickly and safely be returned to service by today's existing procedures.

We are concerned that NTSB has not fully addressed the financial ramifications to the helicopter industry, in addition to time out of service, insurance rates will increase when this is shown as an accident, and will affect the value of the aircraft upon sale, etc.

We feel that this proposed change will provide little improvement in safety and will result in significant delays in effecting repairs and returning aircraft to service, which will put an unreasonable burden directly on operators and indirectly to the public.

Other concerns are the ability of the NTSB to conduct "in the field investigations" in a timely manner, and what impact will this eventually have on the budget for the F.A.A. NTSB field operatives currently investigate less than 5% of non-injury accidents (NTSB website).

We appreciate any help you can give to prevent this amendment from being implemented.

Respectfully,

Wanda L. Rogers
President